

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

EDDY LUC,
*individually and on behalf of others similarly
situated,*

Plaintiffs

-against-

**THE FARM ON ADDERLEY, and
STEVEN HUBLLE.**

Defendants.

**Case Number: 20-3840
DEMAND FOR JURY TRIAL
COLLECTIVE ACTION
UNDER 29 U.S.C. § 216(b)**

Plaintiff Eddy J. Luc (“Plaintiff Luc” of “Mr. Luc”), by and through his attorney T.A. Blackburn PLLC, upon his knowledge and belief, and as against The Farm on Adderley and Steven Hublle asserts as follows:

1. Mr. Luc brings this action to remedy several egregious unlawful violations of New York City Human Rights Law (NYCHRL), New York State Human Rights Law (NYSHRL), and Title VII of the Civil Rights Act of 1964. (“Title VII”).

PARTIES

2. Plaintiff Luc is a 42-year-old, black Haitian male with a heavy Haitian accent. Mr. Luc resides at 1325 Pennsylvania Avenue, Brooklyn, NY 11239.
3. Defendant The Farm on Adderley (“Defendant Adderley” or “Defendant Corporation”) is a dine in restaurant, with a principal place of business located at 1108 Cortelyou Rd, Brooklyn, NY 11218.
4. Defendant Steven Hublle (“Defendant Hublle”) is an individual who serves as the Head Chef of Defendant Corporations dine in restaurant, with a principal place of business located at 1108 Cortelyou Rd, Brooklyn, NY 11218.
5. At all relevant times hereto, Defendants collectively were Mr. Luc’s “employer” as that term is defined under the NYCHRL, NYSHRL, and TITLE VII.

NATURE OF ACTION

6. This is an action for monetary and declaratory relief to redress Defendants' violation of Plaintiff Luc's workplace rights. Plaintiff Luc seek relief for employment discrimination in violation of Fair Labor Standards Act of 1938, 29 U.S.C. § 201 *et seq.* ("FLSA"), for violations of the N.Y. Labor Law § § 190 *et seq.* and 650 *et seq.* (The "NYLL"), overtime wage orders of the New York Commissioner of Labor codified at N. Y. Comp. Codes R. & Regs. tit. 12, § 146-1.6 (herein the "Spread of Hours Wage Order"), for violation of Title VII of the Civil Rights Act of 1964, as amended ("Title VII"), CPLR 214 (4), the New York Equal Pay Act, (NYSHRL) N.Y. Exec. Law § 290 *et seq.*, (NYSHRL) N.Y. Exec. Law § 296, ("NYCHRL") Administrative Code of City of New York § 8-107 (7), Administrative Code of City of New York § 8-107 (6), and Administrative Code of City of New York § 8-107 (13).
7. At all times relevant to this Complaint, Defendants maintained a policy and practice of knowingly and willfully compensating black and brown employees, less than their Caucasian colleagues in violation of Title VII of the Civil Rights Act of 1964 and New York City and State equal pay laws.
8. At all times relevant to this Complaint, Defendants maintained a policy and practice of requiring Plaintiff Luc, and other similarly situated employees, to work an excess of forty (40) hours per week without providing the overtime compensation required by federal and state laws and regulations.
9. Plaintiff Luc now bring this action on behalf of himself, and other similarly situated employees, for unpaid minimum and overtime wages pursuant to the Fair Labor Standards Act of 1938, 29 U.S.C. § 201 *et seq.* ("FLSA"), and for violations of the N.Y. Labor Law § § 190 *et seq.* and 650 *et seq.* (The "NYLL"), and overtime wage orders of the New York Commissioner of Labor codified at N. Y. Comp. Codes R. & Regs. tit. 12, § 146-1.6 (herein the "Spread of Hours Wage Order"), including applicable liquidated damages, interest, attorneys' fees and costs.
10. Plaintiff Luc seeks certification of this action as a collective action on behalf of himself individually, former employees, and all other similarly situated employees who elect to opt-in to this action pursuant to FLSA, 29 U.S.C. §§ 201 *et seq.*, and specifically, the collective action provision of 29 U.S.C. § 216(b).

ADMINISTRATIVE PROCEDURES

11. Plaintiff Luc filed a Charge of Discrimination with the Equal Employment Opportunity Commission (“EEOC”) for his Title VII race, sex wage discrimination claim. On June 16, 2020, Plaintiff Luc was provided a Notice of Right to Sue by the EEOC. All conditions precedent to the filing of suit have been performed or have occurred.

JURISDICTION AND VENUE

12. Venue is properly set in the Eastern District of New York because The Farm on Adderley is located in this district where it regularly conducts business in Brooklyn, New York.
13. This Court has personal jurisdiction over Defendants pursuant to and consistent with the Constitutional requirements of Due Process in that Defendants, acting directly or through their agents or apparent agents, committed one or more of the following:
- i. The transaction of any business within the state;
 - ii. The making of any contract within the state;
 - iii. The commission of a tortious act within this state; and
 - iv. The ownership, use, or possession of any real estate situated within this state.
14. Requiring Defendants to litigate these claims in New York does not offend traditional notions of fair play and substantial justice. Plaintiff Luc’s claims arise from conduct occurring at The Farm on Adderley by Defendants in Brooklyn, New York.

PARTIES

Plaintiff

15. Plaintiff Luc is an adult individual residing in Kings County, New York.
16. Plaintiff Luc was employed by Defendant Adderley from approximately 2008 to August 19, 2019.
17. Plaintiff Luc consents to be a party plaintiff pursuant to 29 U.S.C. § 216(b), and brings these claims based upon the allegations herein as a representative party of a prospective class of similarly situated individuals under 29 U.S.C. § 216(b).

Defendants

18. At all relevant times, Defendant Corporation own, operate, or control a restaurant, located at 1108 Cortelyou Rd, Brooklyn, NY 11218 under the name “The Farm on Adderley.”
19. Defendant Hublle is the Head Chef at Defendant Corporation. He is also the former supervisor of Plaintiff Luc. Defendant Hublle’s works at 1108 Cortelyou Rd, Brooklyn, NY 11218.

COLLECTIVE ACTION ALLEGATIONS

20. Plaintiff Luc brings the First Cause of Action, an FLSA claim, on behalf of himself and all similarly situated persons who work or have worked for Defendant Corporation who elect to opt-in to this action (the “FLSA Collective”).
21. Defendants are liable under the FLSA for, inter alia, failing to properly compensate Plaintiff Luc and the FLSA Collective.
22. Consistent with Defendants’ policies and patterns or practices, Plaintiff Luc and the FLSA Collective were not paid the proper premium overtime compensation of one and a half times their regular rates of pay for all hours worked beyond 40 hours per workweek.
23. All of the work Plaintiff Luc and the FLSA Collective have performed has been assigned by Defendant, and/or Defendant have been aware of all of the work that Plaintiff and the FLSA Collective have performed.
24. As part of their regular business practice Defendant has intentionally, willfully, and repeatedly engaged in a pattern, practice, and/or policy of violating the FLSA with respect to Plaintiff Luc and the FLSA Collective. This policy and pattern or practice includes, but is not limited to, willfully failing to pay their employees, including Plaintiff Luc and the FLSA Collective, proper premium overtime wages for all hours worked in excess of 40 hours per workweek.

CLASS ACTION ALLEGATIONS

25. Plaintiff Luc bring the NYLL claims, under Rule 23 of the Federal Rules of Civil Procedure, on behalf of himself and a class of persons consisting of:

All persons who work or have worked as line cooks or hourly employees for Defendant Corporation in New York State between 2013 and the date of final judgment in this matter (the “Rule 23 Class”).

26. The Rule 23 Class Members are so numerous that joinder of all members is impracticable, and the disposition of their claims as a class will benefit the parties and the Court.
27. Plaintiff Luc claims are typical of those claims that could be alleged by any Rule 23 Class Member, and the relief sought is typical of the relief which would be sought by each Rule 23 Class Member in separate actions.
28. Plaintiff Luc and the Rule 23 Class Members have all been injured in that they have been uncompensated or under-compensated due to Defendants' common policies, practices, and patterns of conduct. Defendants' corporate-wide policies and practices affected all Rule 23 Class Members similarly, and Defendants benefited from the same type of unfair and/or wrongful acts as to each of the Rule 23 Class Members.
29. Plaintiff Luc is able to fairly and adequately protect the interests of the Rule 23 Class Members and has no interests antagonistic to the Rule 23 Class Members.
30. Plaintiff Luc is represented by an attorney who is experienced and competent.
31. A class action is superior to other available methods for the fair and efficient adjudication of the controversy – particularly in the context of wage and hour litigation where individual class members lack the financial resources to vigorously prosecute a lawsuit against corporate defendants. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently, and without the unnecessary duplication of efforts and expense that numerous individual actions engender.
32. Common questions of law and fact exist as to the Rule 23 Class that predominate over any questions only affecting Plaintiff and the Rule 23 Class Members individually and include, but are not limited to, the following:
 - a. Whether Defendants failed to compensate Plaintiff Luc and the Rule 23 Class for all hours worked at their regular rate(s) of pay;
 - b. Whether Defendants failed to compensate Plaintiff Luc and the Rule 23 Class for hours worked in excess of 40 per work week;
 - c. Whether Defendants failed to furnish Plaintiff Luc and the Rule 23 Class with accurate statements with every payment of wages, as required by the NYLL;
 - d. The nature and extent of class-wide injury and the measure of damages for those injuries.

FACTUAL ALLEGATIONS

Defendants Constitute Joint Employers

33. Defendant's operate a restaurant located in New York City, in the borough of Brooklyn.
34. Defendant's act in the interest of itself with respect to employees, pay employees by the same method, and share control over the employees.
35. Defendant's possessed substantial control over Plaintiff Luc, and other similarly situated employees, working conditions, and over the policies and practices with respect to the employment and compensation of Plaintiff Luc and all similarly situated employees, referred to herein.
36. Defendant's employed Plaintiff Luc, and all similarly situated employees, and are Plaintiff Luc's, and other similarly situated employees, employers within the meaning of 29 U.S.C. 201 et seq. and the NYLL.
37. In the alternative, Defendant constitute a single employer of Plaintiff Luc and all similarly situated employees.
38. At all relevant times, Defendants were Plaintiff Luc's employer within the meaning of the FLSA and NYLL. Defendants had the power to hire and fire Plaintiff Luc, controlled the terms and conditions of his employment, and determined the rate and method of any compensation in exchange for Plaintiff Luc's services.

Individual Plaintiff

39. Plaintiff Luc is a former employee of Defendants who was employed as a line cook.
40. Plaintiff Luc seeks to represent a class of similarly situated individuals under 29 U.S.C. 216(b).

Plaintiff Luc

41. Plaintiff Luc is a husband and a proud father of 2. He served in the United States Marines for over 10 years and fought on the frontlines in the Iraq.
42. Plaintiff Luc is an American patriot who put his life on the line so a person like Defendant Hublle, and a company like Defendant Adderley can have the freedom to engage in the discriminatory behavior they shamelessly visited upon Plaintiff Luc.
43. Plaintiff Luc was employed by the Defendants from approximately 2008 until August 19, 2019. Defendants employed Plaintiff Luc in a myriad of roles, the final being a line cook.

44. Plaintiff Luc was hired as a "Salad Guy" at a salary of \$10 per hour. When the minimum wage increased, Mr. Luc's salary went to \$15 per hour. Although he was hired as a salad guy, Mr. Luc was a "jack of all trades." Throughout his tenure, Mr. Luc worked as the dishwasher, pastry cook, station cleaner, and line cook.
45. Plaintiff Luc was praised consistently by customers and his co-workers for being kind, courteous, and providing excellent customer service. So much so, he was often asked to work extended hours before and after his scheduled shifts.
46. Plaintiff Luc was the only employee with a Food Handlers Permit. Therefore, Mr. Luc was required to walk the Inspectors from the Department of Health through the kitchen and stock room whenever they conducted their inspections. One would think that since Mr. Luc was the only employee with this essential permit, he would be highly compensated. Not only was Mr. Luc not highly compensated, he was compensated less than his Caucasian female colleague, Teresa, and Caucasian male colleague, Joe Short.
47. Plaintiff Luc's work duties required neither discretion nor independent judgment. Throughout his employment with Defendants, Plaintiff Luc regularly worked in excess of forty (40) hours per week.
48. Plaintiff Luc sustained substantial psychological and monetary injuries as a result of the hostile work environment he was subjected to while an employee of Defendant Adderley by his former manager, Defendant Hublle, as well as, Defendant Adderley's senior management.
49. Plaintiff Luc has firsthand knowledge of Defendant Adderley's violating the US Department of Labor's wage and hour laws.

Steven Hublle Commits Overtime Theft

50. The Fair Labor Standards Act requires covered employers to pay employees at least the applicable federal minimum wage for all hours worked and overtime pay for hours worked over 40 hours in a workweek.
51. Restaurants and food service workers are covered employers under Section 3(s)(1)(B) of the FLSA.
52. According to the NYLL, an employer is required to pay overtime to employees, unless otherwise exempt, at the rate of 1½ times the employee's regular rate of pay for all hours worked over 40 hours in a workweek.

53. Plaintiff Luc is prepared to prove that Defendant Hublle, as well as, Defendant Adderley's senior management stole hundreds of hours of overtime from him. The evidence will show that Mr. Luc Started work at 5am or 7am and would punch out at 2pm or 6pm. This is an average of 9 to 11 hours a day.

54. In a 7-day work week Mr. Luc worked an average of 56 to 60 hours a week. These hours were not reflected on his paychecks.

Plaintiff Luc Estimated Hours Worked

Dates worked, estimated hours worked, rate of pay, estimated overtime owed:

| Date Worked | Hours Worked | Overtime Owed (converted to minutes) | Rate of Pay: Time and a half | NYC Spread of Hours Owed |
|-------------|--------------|--|---------------------------------|--------------------------------|
| 01/01/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/02/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/03/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/04/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 01/14/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/15/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/16/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 06/27/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/28/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/29/2013 | 11 Hours | 3 Hour | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 07/01/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 07/03/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/04/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 07/11/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/12/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/13/2013 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 07/19/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/20/2013 | 11 Hours | 3 Hour | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 07/27/2013 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 07/30/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 09/02/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 10/24/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 11/01/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/02/2013 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 11/29/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/30/2013 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 12/02/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 12/05/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 12/07/2013 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 hour |
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| 12/16/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 12/28/2013 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 12/30/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/31/2013 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| Total Owed 2013 | | 417 Hours | \$8,913.37 | Hours: 52 Rate: \$11.10 \$577.20 |
| 01/01/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/02/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/03/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/04/2014 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 01/07/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 01/11/2014 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 02/01/2014 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 02/03/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 02/24/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 02/28/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/01/2014 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 03/03/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/04/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 04/27/2014 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 04/29/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 04/30/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/01/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 05/03/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 05/11/2014 | 11 Hours | 3 Hour | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 05/18/2014 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 05/20/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/21/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 12/30/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/31/2014 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| Total Owed 2014 | | 418 Hours | \$8,932.66 | Hours: 52 Rate: \$11.10 \$577.20 |
| 01/01/2015 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/02/2015 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/03/2015 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 02/02/2015 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 02/28/2015 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 03/02/2015 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 12/31/2015 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| Total Owed 2015 | | 417 Hours | \$8,911.29 | Hours: 52 Rate: \$11.10 \$577.20 |
| 01/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/02/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 01/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/05/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/06/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/07/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/08/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/09/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 01/11/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/12/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/13/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/14/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/16/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 01/18/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/19/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/20/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/21/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/23/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 01/25/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/26/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/27/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/28/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/29/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 01/30/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |

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|------------|----------|---------|----------------------------|--------|
| 02/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/03/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/05/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/06/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 02/08/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/09/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/10/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/11/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/12/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/13/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 02/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/16/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 02/19/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/20/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 02/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/23/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/24/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/25/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/26/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 02/27/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 02/29/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/05/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 03/07/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 03/11/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/12/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 03/21/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 03/24/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |

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| 03/25/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/26/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 03/28/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 03/30/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 03/31/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 04/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 04/02/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 04/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 04/05/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 04/06/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 04/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 04/23/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 04/30/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 05/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/03/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 05/07/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 05/17/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/18/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 05/21/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 05/24/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/25/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/26/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/27/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/28/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 05/30/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 05/31/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/03/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/04/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 06/06/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/07/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 06/09/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 06/11/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 06/14/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 06/20/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 06/27/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 06/28/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 07/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/02/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 07/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/05/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 07/08/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/09/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 07/11/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/12/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/13/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/14/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/16/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 07/18/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/19/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/20/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/21/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/23/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 07/26/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/27/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 07/29/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 07/30/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 08/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 08/06/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 08/13/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 08/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 08/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 08/24/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 08/25/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 08/26/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 08/30/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 08/31/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 09/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 09/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 09/03/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 09/05/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 09/06/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 09/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 10/01/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 10/03/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 10/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 10/06/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 10/12/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
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| 10/15/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 10/31/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/03/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/04/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/05/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 11/07/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/08/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/09/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/10/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/11/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/12/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 11/14/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/16/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/17/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/18/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/19/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 11/21/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/23/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/24/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/25/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/26/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 11/28/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/29/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 11/30/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/01/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/02/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/03/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 12/05/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/06/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/07/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/08/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/09/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/10/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 12/12/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |

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|-----------------|----------|-----------|----------------------------|--|
| 12/13/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/14/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/15/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/16/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/17/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
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| 12/22/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/23/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/24/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| 12/26/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/27/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/28/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/29/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/30/2016 | 9 Hours | 1 Hour | $\$14.25 + 50\% = \21.37 | |
| 12/31/2016 | 11 Hours | 3 Hours | $\$14.25 + 50\% = \21.37 | 1 Hour |
| Total Owed 2016 | | 419 Hours | \$8,954.03 | Hours: 53 Rate: \$11.10 \$588.30 |
| 01/02/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/05/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/06/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/07/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 01/09/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/10/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/11/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/12/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/13/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/14/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 01/16/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 01/18/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/19/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 01/21/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 01/23/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 01/25/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/26/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/27/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 01/28/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 01/30/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |

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|------------|----------|---------|----------------------------|--------|
| 01/31/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 02/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 02/02/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 02/04/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 02/11/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 02/18/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 02/25/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 02/27/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 02/28/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 03/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 03/02/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 03/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 03/04/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 03/09/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 03/11/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 03/24/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 03/25/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 03/27/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 03/31/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 04/01/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 04/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 04/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 04/29/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 05/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/02/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 05/11/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 05/16/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/17/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/18/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/19/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 05/20/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 05/22/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 05/27/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 05/31/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 06/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 06/03/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 06/29/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 06/30/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 07/01/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 07/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 07/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 07/07/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 07/08/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 07/10/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 07/11/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 07/18/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 07/21/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 07/22/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 07/24/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 08/11/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 08/29/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 09/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/02/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 09/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/05/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/06/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/07/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/08/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/09/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 09/11/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/12/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 09/15/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/16/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 09/19/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/20/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/21/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/22/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/23/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 09/25/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 09/27/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/28/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/29/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 09/30/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 10/02/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 10/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 10/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 10/05/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 10/20/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 10/26/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 10/27/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 10/28/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 10/30/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 10/31/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/02/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/03/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/04/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 11/06/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/07/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 11/11/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 11/14/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 11/16/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/17/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/18/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 11/20/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/21/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 11/23/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/24/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/25/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 11/27/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 11/28/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 11/30/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 12/01/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 12/02/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| 12/04/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 12/05/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 12/08/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 12/12/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
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| 12/16/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 12/23/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
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| 12/28/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 12/29/2017 | 9 Hours | 1 Hour | $\$14.75 + 50\% = \22.13 | |
| 12/30/2017 | 11 Hours | 3 Hours | $\$14.75 + 50\% = \22.13 | 1 Hour |
| Total Owed 2017 | | 416 Hours | \$9,204.00 | Hours: 52 Rate: \$13.10 \$681.20 |
| 01/01/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/02/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/03/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/04/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/05/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/06/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 01/08/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/09/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/10/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/11/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/12/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 01/29/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |

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| 01/30/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 02/01/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 02/02/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 03/01/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 03/23/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 03/24/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
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| 03/31/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 04/02/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 06/29/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 06/30/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 07/02/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/03/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 07/06/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/07/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 07/09/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 07/14/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
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| 07/23/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 08/28/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 12/11/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 12/29/2018 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 12/31/2018 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| Total Owed 2018 | | 417 Hours | \$9,382.50 | Hours: 52 Rate: \$15.00 \$780.00 |
| 01/01/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/02/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 01/03/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 01/29/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 02/01/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 02/02/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 02/04/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
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| 05/09/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 05/10/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 05/11/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 05/13/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |

| | | | | |
|------------|----------|---------|------------------------|--------|
| 05/14/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/15/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/16/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/17/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/18/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 05/20/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/21/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/22/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/23/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/24/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/25/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 05/27/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/28/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/29/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/30/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 05/31/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/01/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 06/03/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/04/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/05/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/06/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/07/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/08/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 06/10/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/11/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/12/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/13/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/14/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/15/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 06/17/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/18/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/19/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/20/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/21/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/22/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 06/24/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/25/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/26/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/27/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/28/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 06/29/2019 | 11 Hours | 3 Hours | \$15.00 + 50%= \$22.50 | 1 Hour |
| 07/01/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 07/02/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 07/03/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |
| 07/04/2019 | 9 Hours | 1 Hour | \$15.00 + 50%= \$22.50 | |

| | | | | |
|--|----------|-------------|----------------------------|--|
| 07/05/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/06/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 07/08/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/09/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/10/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/11/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/12/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/13/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 07/15/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/16/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/17/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/18/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/19/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/20/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 07/22/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/23/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/24/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/25/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/26/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/27/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 07/29/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/30/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 07/31/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/01/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/02/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/03/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 08/05/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/06/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/07/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/08/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/09/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/10/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| 08/12/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/13/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/14/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/15/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/16/2019 | 9 Hours | 1 Hour | $\$15.00 + 50\% = \22.50 | |
| 08/17/2019 | 11 Hours | 3 Hours | $\$15.00 + 50\% = \22.50 | 1 Hour |
| Total Owed 2019 | | 263 Hours | \$5,917.50 | Hours: 33 Rate: \$15.00 \$495.00 |
| Estimated Unpaid Overtime Hours | | 2,761 Hours | \$60,215.35 | Hours: 346 \$4,276.10 |

| | | | | |
|-----------------------------|-------------|--|--------------|--|
| 9% Interest | \$5,804.23 | | | |
| NYLL 100% Penalty | \$70,295.68 | | | |
| FLSA 100% Penalty | \$70,295.68 | | | |
| Estimated Total wages owed: | | | \$210,877.04 | |

55. Plaintiff Luc is prepared to reveal how managers and supervisors would go into the Timecard System and change the punch in and punch out times of the kitchen workers. This illegal act reduces the employees daily and weekly hours worked. Mr. Luc would then have to beg and plead with his supervisor and managers to pay him his time. Unfortunately for Mr. Luc the payments never came.

Plaintiff Luc is a Victim of Wage Discrimination

56. The New York State Equal Pay Law prohibits sex discrimination in compensation for jobs in the same establishment¹ That requires equal skill, effort, and responsibility, and that are performed under similar working conditions. The law applies to all employers, regardless of size (NY Labor Law Sec. 194 et seq.).

57. Differences in the rate of pay are permissible when they are based on 1. A seniority system; 2. A merit system; 3. A system that measures earnings by quality or quantity of production; 4. Any bona fide factor is other than race such as education, training, or experience. Under the law, the bona fide factor must be job-related and consistent with business necessity². Comparatively, Title VII prohibit compensation discrimination based on race, color, religion, sex, national origin, age, or disability.

58. Mr. Luc earned \$15 per hour as a prep cook, while his Caucasian counterparts, Teresa and Joe Short earned over \$20 per hour. Mr. Luc trained Teresa when she began her employment with the Company.

¹ Employees are considered to work at the “same establishment” if they work for the same employer at workplaces located in the same geographical region, no larger than a county, taking into account population distribution, economic activity, and the presence of municipalities.

². A “business necessity” is defined as a factor that bears a manifest relationship to the employment in question.

59. When Mr. Luc questioned his manager, Defendant Hublle about the discrepancy in pay, Defendant Hublle could not point to any bona fide factor other than race and gender to justify the pay difference.
60. Defendant Corporation and Defendant Hublle cannot point to a seniority system, a merit-based system, or a system that measures earnings based on quality or quantity of production. If this were the case, Mr. Luc would have a decade-plus of seniority over Teresa. Mr. Luc would have more merit than Teresa since he trained her and is the only member of the staff with the Food Handlers Permit.
61. Defendant Hublle and Defendant Corporation engaged in egregious race, color, and gender discrimination when they terminated Mr. Luc in retaliation for questioning this discrepancy in pay.

Wage Discrimination Damages³:

| Year | Mr. Luc Earned | Mr. Short Earned | Difference | Regular Hours worked (40) x Weeks worked (51) x Difference = Damages owed |
|------|----------------|---|---|--|
| 2013 | \$14.25 | \$23.00 | \$8.75 | \$17,850.00 |
| 2014 | \$14.25 | \$23.00 | \$8.75 | \$17,850.00 |
| 2015 | \$14.25 | \$23.00 | \$8.75 | \$17,850.00 |
| 2016 | \$14.25 | \$23.00 | \$8.75 | \$17,850.00 |
| 2017 | \$14.75 | \$23.00 | \$8.25 | \$16,830.00 |
| 2018 | \$15.00 | Left company and was replaced by Teresa | \$8.00 (based on Joes Short comparator) | \$16,320.00 |
| 2019 | \$15.00 | Teresa (\$20.00) | \$8.00 (based on Joe Short comparator) | \$9,520.00 (based on the 7 months Mr. Luc worked prior to his termination) |

³ Mr. Luc's comparator is Joe Short who earned \$23.00 per hour.

| | | | | |
|----------------------------|--|--|--|--------------|
| Total | | | | \$114,070.00 |
| 9% Interest | | | | \$10,266.30 |
| NYLL 100% | | | | \$134,602.60 |
| FLSA 100% | | | | \$134,602.60 |
| Estimated Total Damages | | | | \$403,807.80 |

FLSA Collective Action Claims

62. Plaintiff's bring this FLSA overtime compensation, and liquidated damages claims as a collective action pursuant to FLSA Section 16(b), 29 U.S.C. § 216(b), on behalf of all similarly situated employees (the "FLSA Class Members"), i.e., persons who are or were employed by Defendant's, on or after the date that is three years before the filing of the complaint in this case (the "FLSA Class Period").
63. At all relevant times, Plaintiff's and other members of the FLSA Class were similarly situated in that they had substantially similar job requirements and pay provisions, and have been subject to Defendants' common practices, policies, programs, procedures, protocols and plans including willfully failing and refusing to pay them the required overtime pay at a one and one-half their regular rates for work in excess of forty (40) hours per workweek under the FLSA, and willfully failing to keep records required by the FLSA.
64. The claims of Plaintiff's stated herein are similar to those of the other employees.

TITLE VII Of the Civil Rights Act Of 1964 Claims

65. Defendants have engaged in egregious acts of race discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended.
66. Plaintiffs willfully and intentionally pay Caucasian employees substantially more, than they pay non-Caucasian employees who perform the same job under similar circumstances, regardless of experience or qualifications. Plaintiffs can point to no legitimate factor such as a, seniority system, merit system, productivity system, or any factor other than race and gender, to excuse their blatant acts of wage discrimination.

67. Not only do Plaintiffs commit gender and race discrimination in violation of Title VII of the Civil Rights Act of 1964, they also retaliate against employees who are courageous enough to speak up and demand equality.
68. Plaintiff Luc is a victim of Defendant's retaliation.

FIRST CAUSE OF ACTION

FAIR LABOR STANDARDS ACT-OVERTIME WAGES

(Brought on behalf of Plaintiff Luc and the purported Rule 23 Class)

69. Plaintiff Luc repeats and realleges all paragraphs above as though fully set forth herein.
70. The overtime wage provisions set forth in the FLSA, 29 U.S.C. §§ 201 *et seq.*, and the supporting federal regulations, apply to Defendants and protect Plaintiff's and the FLSA Class members.
71. Defendants, in violation of 29 U.S.C. § 207(a)(1), failed to pay Plaintiff's and the FLSA Class Members overtime compensation at a rate of one and one-half times the regular rate of pay for each hour worked in excess of forty hours in a work week.
72. Defendants' failure to pay Plaintiff's and the FLSA Class members, overtime compensation was willfully within the meaning of 29 U.S.C. § 255(a).
73. As a result of Defendants' willful violations of the FLSA, Plaintiff's and the FLSA class members have suffered damages by being denied overtime compensation in amounts to be determined at trial, and are entitled to recovery to such amounts, liquidated damages, prejudgment interest, attorneys' fees and costs, and other compensation pursuant to 29 U.S.C. §§ 201 *et seq.*

SECOND CAUSE OF ACTION

VIOLATION OF THE OVERTIME PROVISIONS

OF THE NEW YORK STATE LABOR LAW

(Brought on behalf of Plaintiff Luc and the prospective Rule 23 Class)

74. Plaintiff Luc and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.
75. Defendants, in violation of N.Y. Lab. Law § 190 *et seq.*, and supporting regulations of the New York State Department of Labor, failed to pay Plaintiff and all similarly situated employees,

overtime compensation at rates of one and one-half times the regular rate of pay for each hour worked in excess of forty (40) hours in a work week.

76. Defendants' failure to pay Plaintiff and all similarly situated employees, overtime compensation was willful within the meaning of N.Y. Lab. Law § 663.

77. Plaintiff Luc and all similarly situated employees, are entitled to recover from Defendants their unpaid overtime wages, liquidated damages as provided for by the NYLL, reasonable attorneys' fees and costs, and pre-judgment and post-judgment interest.

THIRD CAUSE OF ACTION

VIOLATION OF THE TIMELY PAYMENT PROVISIONS OF THE NEW YORK LABOR LAW

(Brought on behalf of Plaintiff Luc and the prospective Rule 23 Class)

78. Plaintiff Luc and all similarly situated employees, repeats and realleges all paragraphs above as though set forth fully herein.

79. Defendants did not pay Plaintiff's, and all similarly situated employees, on a weekly basis in violation of NYLL § 191.

80. Defendants are liable to Plaintiff's and all similarly situated employees, in an amount to be determined at trial.

FOURTH CAUSE OF ACTION

VIOLATION OF THE SPREAD OF HOURS WAGE ORDER OF THE NEW YORK COMMISSIONER OF LABOR

(Brought on behalf of Plaintiff Luc and the Rule 23 Class)

81. Plaintiff Luc and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.

82. Defendants failed to pay Plaintiff Luc and all similarly situated employees, one additional hour's pay at the basic minimum wage rate before allowances for each day Plaintiff's and all similarly situated employees, spread of hours exceeded ten hours in violation of NYLL §§ 650 *et seq.* and 12 N.Y.C.R.R. §§ 146-1.6.

83. Defendants' failure to pay Plaintiff Luc and all similarly situated employees, an additional hour's pay for each day Plaintiff's and all similarly situated employees, spread of hours exceeded ten hours was willful within the meaning of NYLL § 663.
84. Plaintiff Luc and all similarly situated employees, was damaged in an amount to be determined at trial.

FIFTH CAUSE OF ACTION

**VIOLATION OF THE NOTICE AND RECORDKEEPING
REQUIREMENTS OF THE NEW YORK LABOR LAW
(Brought on behalf of Plaintiff Luc and the Rule 23 Class)**

85. Plaintiff Luc and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.
86. Defendants failed to provide Plaintiff Luc and all similarly situated employees, with a written notice, in English and in French (Plaintiff's Luc's primary language), containing: the rate or rates of pay and basis thereof, whether paid by the hour, shift, day, week, salary, piece, commission, or other; allowances, if any, claimed as part of the minimum wage, including tip, meal, or lodging allowances; the regular pay day designated by the employer; the name of the employer; any "doing business as" names used by the employer; the physical address of the employer's main office or principal place of business, and a mailing address if different; and tighten telephone number of the employer, as required by NYLL § 195(1).
87. Plaintiff's and all similarly situated employees are damaged in an amount to be determined at trial.

SIXTH CAUSE OF ACTION

**VIOLATION OF THE WAGE STATEMENT PROVISIONS
OF THE NEW YORK LABOR LAW
(Brought on behalf of Plaintiff Luc and the Rule 23 Class)**

88. Plaintiff Luc and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.
89. With each payment of wages, Defendants failed to provide Plaintiff Luc and all similarly situated individuals, with an accurate statement listing each of the following: the dates of work covered by that payment of wages; name of employee; name of employer; address and phone

number of employer; rate or rates of pay as basis thereof, whether paid by the hour, shift, day, week, salary, piece, commission, or other; gross wages; deductions; allowances, if any, claimed as part of the minimum wage; net wages; the regular hourly rate or rates of pay; the overtime rate or rates of pay; the number of regular hours worked; and the number of overtime hours worked, as required by NYLL § 195(3).

90. Due to Defendants' violation of NYLL, Article 6, § 195(3), Plaintiff Luc and all similarly situated employees, are entitled to statutory penalties of two hundred fifty dollars for each workweek that Defendants failed to provide them with accurate wage statements, or a total of five thousand dollars, and reasonable attorneys' fees and costs as provided for by NYLL, Article 6, § 198(1-d).

SEVENTH CAUSE OF ACTION

VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

(Brought on behalf of Plaintiff Luc and the Rule 23 Class)

91. Plaintiff Luc and all similarly situated employees, repeats and realleges all paragraphs above as though fully set forth herein.
92. At all relevant times, Plaintiff Luc and all similarly situated employees, have been subject to Defendants' common practices, policies, programs, procedures, protocols and plans including willfully engaging in conduct that violates the Civil Rights Act of 1964 § 701 et seq., 42 U.S.C.A. § 2000e *et seq.*
93. This claim is authorized and instituted pursuant to Title VII of the Civil Rights Act, 42 U.S.C. § 2000e *et seq.*, based upon the discriminatory employment practices of Defendants. Specifically, Plaintiff's complains that Defendants discriminated against him in wages based upon his race and gender, causing him to suffer substantial injury and damages.
94. Upon information and belief, Plaintiff Luc and all similarly situated employees, are paid less than the rate at which their similarly situated Caucasian colleagues (Teresa and Joe Short) are paid for a job requiring equal skill and performed under similar working conditions.
95. In addition, upon information and belief, Plaintiff Luc and similarly situated employees, were offered less than the rate at which their similarly situated Caucasian colleagues are paid for a job requiring equal skill and performed under similar working conditions.

96. Defendants' failure to pay Plaintiff Luc and all similarly situated employees, equally with his Caucasian coworkers was based on the Defendants disdain for Plaintiffs race and gender, in violation of Title VII of the Civil Rights Act, 42 U.S.C. § 2000e *et seq.*

97. Plaintiff Luc, and all similarly situated employees are damaged in an amount to be determined at trial.

EIGHT CAUSE OF ACTION

Unlawful Retaliation in violation of NYCHRL

(Plaintiff Luc)

98. Plaintiff Luc repeats and realleges all paragraphs above as though fully set forth herein.

99. At all relevant times, Plaintiff Luc have been subject to Defendants' common practices, policies, programs, procedures, protocols and plans including willfully engaging in conduct that violates New York City Human Rights Law ("NYCHRL"), Administrative Code of City of New York § 8-107 (7).

100. Plaintiff Luc participated in a protected activity by complaining to upper management on a myriad of claims. After doing so, Plaintiff Luc allege defendant corporation took a number of adverse employment actions against him, including, *inter alia*, being subjected to heightened scrutiny of his work product, stealing his pay, and finally terminating his employment.

101. The causal connection between the protected activity and the adverse employment actions are evidenced by their temporal proximity.

102. As his employer, defendants engaged in egregious prohibited conduct listed above. This egregious prohibited conducted caused Plaintiff Luc to suffer with severe depression and anxiety, which led to them to resign from their jobs.

103. Defendants actions and omissions warrant an award of punitive damages.

NINTH CAUSE OF ACTION

Unlawful Retaliation in violation of NYSHRL

(Plaintiff Luc)

104. Plaintiff Luc repeats and realleges all paragraphs above as though fully set forth herein.

105. At all relevant times, Plaintiff Luc has been subject to Defendants' common practices, policies, programs, procedures, protocols and plans including willfully engaging in conduct

that violates New York State Human Rights Law (“NYSHRL”), Executive Law State of New York § 296.

106. Plaintiff Luc participated in a protected activity by complaining to upper management on a myriad of claims. After doing so, Plaintiff Luc allege defendant corporation took a number of adverse employment actions against him, including, inter alia, being subjected to heighten scrutiny of his work product, stealing his pay, and finally terminating his employment.
107. The causal connection between the protected activity and the adverse employment actions are evidenced by their temporal proximity.
108. As his employer, defendants engaged in egregious prohibited conduct listed above. This egregious prohibited conducted caused Plaintiff Luc to suffer with severe depression and anxiety, which led to them to resign from their jobs.
109. Defendants actions and omissions warrant an award of punitive damages.

TENTH CAUSE OF ACTION

Unlawful Retaliation in violation of Title VII of the Civil Rights Act of 1964

(Plaintiff Luc)

110. Plaintiff Luc repeats and realleges all paragraphs above as though fully set forth herein.
111. At all relevant times, Plaintiff Luc have been subject to Defendants’ common practices, policies, programs, procedures, protocols and plans including willfully engaging in conduct that violates Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e.
112. Plaintiff Luc participated in a protected activity by complaining to upper management on a myriad of claims. After doing so, Plaintiff Luc allege defendant corporation took a number of adverse employment actions against him, including, inter alia, being subjected to heighten scrutiny of his work product, stealing his pay, and finally terminating his employment.
113. The causal connection between the protected activity and the adverse employment actions are evidenced by their temporal proximity.
114. As his employer, defendants engaged in egregious prohibited conduct listed above. This egregious prohibited conducted caused Plaintiff Luc to suffer with severe depression and anxiety, which led to them to resign from their jobs.
115. Defendants actions and omissions warrant an award of punitive damages.

ELEVENTH CAUSE OF ACTION

VIOLATION OF NYC ADMINISTRATIVE CODE

(Brought on behalf of Plaintiff Luc for

Aiding and Abetting brought against Steven Hublle)

116. Pursuant to N.Y.C. Admin. Code § 8-107(6) Aiding and abetting. It shall be an unlawful discriminatory practice for any person to aid, abet, incite, compel or coerce the doing of any of the acts forbidden under this chapter, or to attempt to do so.
117. Plaintiff Luc repeats and realleges all paragraphs above as though fully set forth herein.
118. Plaintiff Luc participated in a protected activity by complaining to upper management on a myriad of claims. After doing so, Plaintiff Luc allege defendant corporation took a number of adverse employment actions against him, including, inter alia, being subjected to heighten scrutiny of his work product, stealing his pay, and finally terminating his employment.
119. These acts were implemented by Steven Hublle.
120. The causal connection between the protected activity and the adverse employment actions are evidenced by their temporal proximity.
121. As his supervisor and or manager, defendant Steven Hublle engaged in egregious prohibited conduct listed above. This egregious prohibited conducted caused Plaintiff Luc to suffer with severe depression and anxiety.
122. Defendants actions and omissions warrant an award of punitive damages.

TWELFTH CAUSE OF ACTION

VIOLATION OF NYC ADMINISTRATIVE CODE

(Brought on behalf of Plaintiff Luc for

Employer liability for discriminatory conduct by employee, agent or independent contractor brought against Defendant corporation)

123. New York City Human Rights Law § 8-107(13)(b), imposes liability on the employer for its employee's conduct in three instances: (1) where the offending employee exercised managerial or supervisory responsibility; (2) where the employer knew of the offending employee's unlawful discriminatory conduct and acquiesced in it or failed to take immediate and appropriate corrective action'; and (3) where the employer should have known

of the offending employee's unlawful discriminatory conduct yet failed to exercise reasonable diligence to prevent it.

124. Plaintiff Luc repeats and realleges all paragraphs above as though fully set forth herein.

125. There is sufficient evidence from which a reasonable trier of fact could find that Defendant Corporation knew or should have known about Steven Hublle's conduct.

126. Defendants have engaged in egregious acts of discrimination and theft of time. When Plaintiff's complained or went against Defendants unethical and illegal acts, Defendants retaliated.

127. The causal connection between the protected activity and the adverse employment actions are evidenced by their temporal proximity.

128. As the employer, defendant engaged in egregious prohibited conduct listed above. This egregious prohibited conducted caused Plaintiff Luc to suffer with severe depression and anxiety, which led to his wrongful termination.

129. Defendants actions and omissions warrant an award of punitive damages.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Luc respectfully requests that this Court enter judgment against Defendants by:

- a) Designating this action as a collective action and authorizing prompt issuance of notice pursuant to 29 U.S.C. § 216(b) to all putative class members apprising them of the pendency of this action, and permitting them to promptly file consents to be Plaintiffs in the FLSA claims in this action;
- b) Declaring that Defendants violated the minimum wage provisions of, and associated rules and regulations under, the FLSA as to Plaintiff's and the FLSA Class members;
- c) Declaring that Defendants violated the overtime wage provisions of, and associated rules and regulations under, the FLSA as to Plaintiff's and the FLSA Class members;
- d) Declaring that Defendants violated the record keeping requirements of, and associated rules and regulations under, the FLSA with respect to Plaintiff's and the FLSA Class members' compensation, hours, wages, and any deductions or credits taken against wages;
- e) Declaring that Defendants' violations of the provisions of the FLSA were willful as to Plaintiff 's and the FLSA Class members;

- f) Awarding Plaintiff's and the FLSA Class Members damages for the amount of unpaid minimum wages, overtime compensation, and damages for any improper deductions or credits taken against wages under the FLSA as applicable;
- g) Awarding Plaintiff's and the FLSA Class members liquidated damages in an amount equal to 100% of their damages for the amount of unpaid minimum wage and overtime compensation, and damages for any improper deductions or credits taken against wages under the FLSA as applicable pursuant to 29 U.S.C. § 216(b);
- h) Declaring that Defendants violated the minimum wage provisions of, and rules and orders promulgated under, the NYLL as to Plaintiff's and all similarly situated employees;
- i) Declaring that Defendants violated the overtime wage provisions of, and rules and orders promulgated under, the NYLL as to Plaintiff's and all similarly situated employees;
- j) Declaring that Defendants violated the timely payment provisions of, and rules and orders promulgated under, the NYLL as to Plaintiff's and all similarly situated employees;
- k) Declaring that Defendants violated the notice and record keeping requirements of the NYLL with respect to Plaintiff's and all similarly situated employee's compensation, hours, wages and any deductions of credits taken against wages;
- l) Declaring that Defendants' violations of the New York Labor Law and spread of hour wages order were willful as to Plaintiff's and the FLSA Class members;
- m) Declaring that Defendants violated the federal Equal Pay Act of 1963 with respect to Plaintiff Luc and all similarly situated employees, compensation, hours, wages and any deductions of credits taken against wages;
- n) Declaring that Defendants' violations of the federal Equal Pay Act of 1963 was willful as to Plaintiff Luc, and all similarly situated employees;
- o) Declaring that Defendants violated Title VII of the Civil Rights Act of 1964 with respect to Plaintiff's and all similarly situated employee's compensation, hours, wages and any deductions of credits taken against wages;
- p) Declaring that Defendants' violations of Title VII of the Civil Rights Act of 1964 were willful as to Plaintiff's and all similarly situated employees;
- q) Awarding Plaintiff's and all similarly situated employees' damages for the amount of unpaid minimum wage and overtime compensation, and for any improper deductions or

credits taken against wages, as well as awarding spread hours pay under the NYLL as applicable;

- r) Awarding Plaintiff's and all similarly situated employees' damages for Defendants' violation of the NYLL notice and recordkeeping provisions, pursuant to NYLL §§ 198(1-b), 198(1-d);
- s) Awarding Plaintiff's liquidated damages in an amount equal to one hundred percent (100%) of the total amount of minimum wage, overtime compensation, and spread of hours pay shown to be owed pursuant to NYLL § 663 as applicable; and liquidated damages pursuant to NYLL § 198(3);
- t) Awarding Plaintiff's and the FLSA Class members pre-judgment and post-judgment interest as applicable;
- u) Awarding Plaintiff's and the FLSA Class members the expenses incurred in this action, including costs and attorneys' fees;
- v) Award Plaintiff Luc, and all others similarly situated employees the value of all compensation and benefits lost and that they will lose in the future as a result of Defendants' unlawful conduct that violated the federal and state Equal Pay laws;
- w) Award Plaintiff's, and all others similarly situated compensatory and punitive damages that stem from Defendants' violation of federal and state Equal Pay laws;
- x) Award Plaintiff Luc, and all others similarly situated employees the value of all compensation and benefits lost and that they will lose in the future as a result of Defendants' unlawful conduct that violated Title VII of the Civil Rights Act of 1964;
- y) Award Plaintiff Luc, and all others similarly situated compensatory and punitive damages that stem from Defendants' violation of Title VII of the Civil Rights Act of 1964;
- z) Award Plaintiffs and all others similarly situated prejudgment interest and attorneys' fees, costs and disbursements, as provided by law;
- aa) Providing that if any amounts remain unpaid upon the expiration of ninety (90) days following issuance of judgment, or ninety (90) days after expiration of the time to appeal and no appeal is then pending, whichever is later, the total amount of judgment shall automatically increase by fifteen (15%) percent, as required by NYLL § 198(4); and
- bb) All such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff 's and all similarly situated employees, demand a trial by jury on all issues triable by a jury.

Dated: New York, New York
August 21, 2020

By: Tyrone A. Blackburn, Esq.

/s/ Tyrone Blackburn
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